

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil Case No.: 0:18-cv-01226 (JRT/LIB)**

<p>Michelle Kealy <i>f/k/a</i> Michelle Mamula, <i>on behalf of herself and all other similarly situated</i></p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>Wings Financial Credit Union, Roquemore Holdings LLC <i>d/b/a</i> Roquemore &amp; Roquemore, John Doe Repossession Companies 1- 10.,</p> <p style="text-align: center;">Defendants</p>	<p><b><u>PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, CLASS NOTICE, CERTIFICATION OF SETTLEMENT CLASS, AND APPOINTMENT OF CLASS COUNSEL AND CLASS REPRESENTATIVE</u></b></p>
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**PLEASE TAKE NOTICE** that pursuant to Rules 23(c)(1) and 23(e) of the Federal Rules of Civil Procedures, Plaintiff Michelle Kealy respectfully moves this Court for an Order: (a) preliminarily approving the settlement of this class action as fair and reasonable; (b) approving the form and method for providing class-wide notice; (c) certifying the Settlement Class; and (d) appointing Class Counsel and a Class Representative.

Plaintiff further moves for Order scheduling a hearing at which the following will be considered: request for final approval of the proposed settlement, any objections filed, incentive awards to the named Plaintiff, and entry of a Final Order.

Said motion has been presented to Defendants Wings Financial Credit Union and Roquemore Holdings LLC. Defendants do not oppose Plaintiff’s motion nor any of the relief requested therein.

Plaintiff's motion will be based on the arguments of counsel, pleadings, files, declarations, exhibits, and memorandum of law submitted herewith in accordance with the Local Rules for the United States District Court for the District of Minnesota. Plaintiff further states as follows:

1. That for the purpose of this settlement, the parties agree to the certification of the following Settlement Class:

*All accounts (1) who were party to vehicle Retail Installment Contract and Security Agreements ("RICs") with Wings that were subject to Minnesota law; and (2) whose vehicles subject to such RICs were repossessed by or on behalf of Wings in Minnesota between May 2, 2015 through May 2, 2018, excluding customers who are deceased or where the repossession was the result of a bankruptcy.*

2. That the Class Representative provides her declaration in support of certification of a Settlement Class and approval of the Settlement Agreement.

3. That the Settlement Class should be certified and that the Settlement Agreement (*Exhibit 1 attached to the Declaration of Adam R. Strauss*) is fair and reasonable and should be approved.

Dated: June 10, 2019

**TARSHISH CODY, PLC**

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Dated: June 10, 2019

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